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June 23, 1995

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William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Washington, D.C. 20554-0001

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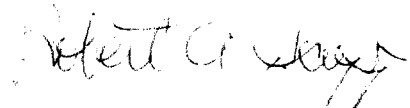
RE: Comments WT95-57

Dear Mr. Caton,

Please find enclosed herewith an original and nine copies of the above-captioned matter.

Thank you for your consideration of this matter.

Respectfully Submitted,



Robert A. Scupp WB5YYX

No. of Copies rec'd  
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

DOCKET FILE COPY ORIGINAL

In the matter of     )

(Amendments to the amateur)  
(service rules including )  
(amendments for examination )  
(credit, eligibility for a club )  
(station license, recognition )  
(of volunteer examiner session )  
(manager, a special event call )  
(sign system, and self assigned )  
(indicator in the station identification )

PR Docket WT 95-57  
RM-8301  
RM-8418  
RM-8462

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COMMENTS OF ROBERT A. SCUPP WB5YYX

**QUALIFICATIONS**

I have been a licensed radio amateur for near 28 years and have served in a wide variety of offices in clubs. I have also served for four years as Vice-Director, Rocky Mountain Division, American Radio Relay League (ARRL) and I am currently an Assistant Director. I currently hold the office of president of Chapter 94 of the Quarter Century Wireless Association (QCWA).

My experiences with these areas of my amateur radio career is also coupled to earlier FCC Rulemaking actions, such as proposing written examination credit in 1985 and other VEC related improvements.

I hope that my comments contained herein meet with the Commission's best interest in serving the amateur radio service and the public.

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## **SUMMARY OF ACTION**

In the current proceeding, the Commission proposes to change the amateur service rules.

These changes include: 1) examination element credit for former licensees, 2) eligibility requirements to obtain a club station license, 3) create a volunteer examiner session manager and 4) create a special event call sign system, 5) create a self-assigned indicator in the station identification.

## **EXAMINATION ELEMENT CREDIT FOR FORMER LICENSEES**

In the current proposal before the Commission, amendment of Section 97.505 would include examination element credit for former amateur radio licenses, except those whom have had their licenses suspended, revoked or cancelled. I agree with the proposal to amend such rules as it would promote the Basis and Purpose contained in Section 97.1:

(a) Recognition and enhancement of the value of the amateur radio service through rules which provide for advancing skills in both the communications and technical phases of the art.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur radio service through rules which provide for advancing skills in both the communications and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

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### **ELIGIBILITY FOR A CLUB STATION LICENSE**

This part of the Commission's proposal would amend rules to meet minimum requirements for a club station license from two persons to four persons. The largest amateur radio organization in the United States is the American Radio Relay League (ARRL). It states that of the 1,957 affiliated clubs, only 10 have two members. I, therefore, agree with adoption of the current proceeding as it apparently would not severely restrict or limit club station license applications to the Commission.

### **VOLUNTEER EXAMINER SESSION MANAGER**

The two largest Volunteer Examiner Coordinators (VEC) in the amateur radio service are the American Radio Relay League (ARRL) and W5YI. Together they both account for the overwhelming majority of examination activity (usually 85-90%). Both have Volunteer Examiner Session managers or contacts by different titles. It still is understood under current and proposed rules that the conduct of the examination is the responsibility of all examiners in attendance and is a requirement (Section 97.509(a) and 97.517). I, therefore, find no reason for hardship to the VECs and VEs evident in this proposal. It simply would bring Part 97 of the Commission's Rules concurrent with standard practices and procedures exhibited by VECs. I, therefore, strongly urge adoption by the Commission of this proposal.

### **SPECIAL EVENT VANITY CALL SIGN SYSTEM**

Under the Commission's proposal, special event vanity call signs would be made available for a limited duration. Given the promotion of Section 97.1(a thru e), I see no evidence of harm to either the amateur radio service or the public it serves. In fact,

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adoption of the proposal herein would enhance public awareness of amateur radio thru such activities and promote new licensees. I, therefore, strongly urge the Commission to adopt this proposal.

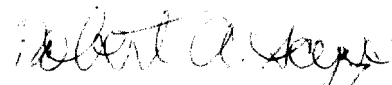
#### **SELF ASSIGNED INDICATOR IN THE STATION IDENTIFICATION**

The Commission proposes to make clarification of Section 97.119(c) concerning station identification with self assigned indicators. Giving flexible in the amateur service rules to permit identifiers before, after or both must be encouraged. It is in this flexibility that the amateur radio service gains strength in its on-the-air conduct and activities.

#### **CONCLUSION**

I, therefore, concur with the current proceeding in all respects and strongly urge its adoption by the Commission at its earliest convenience.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Robert A. Scupp".

Robert A. Scupp WB5YYX